



# Massapequa Water District

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January 17, 2001

Steven M. Scharf, P.E.  
Project Manager  
Bureau Of Eastern Remedial Action  
New York State Department of  
Environmental Conservation  
50 Wolf Road  
Albany, NY 12233

Re: Comments on PRAP-Operable Unit No. 2  
Northrop Grumman-Bethpage Facility-Site No. 1-30-003A  
Naval Weapons Industrial Reserve Plant-Site No. 1-30-003B

Dear Mr. Scharf:

The Massapequa Water District has reviewed the Proposed Remedial Action Plan (PRAP) for Operable Unit No. 2-Groundwater Remedy, for the above referenced sites. Provided below are the District's comments:

1. THE RECORD OF DECISION (ROD) SHOULD NOT INCLUDE OFF-SITE GROUNDWATER AT THIS TIME.

Based on recent groundwater data collected in the vicinity of Hempstead Turnpike, contamination is farther downgradient than previously predicted by the groundwater model used to evaluate contaminant transport. Until the extent of contamination is known, remedial alternatives cannot be properly evaluated and a remedial action cannot be selected.

Although it appears, based on existing information, that only low concentrations of contaminants are migrating south of Hempstead Turnpike, it is possible that, similar to the area of GM-18, a slug or slugs of highly contaminated groundwater could exist south of Hempstead Turnpike which could threaten public water supply wells. To mitigate this threat and to preclude the need to provide well head treatment as the solution to provide potable water, remediation of contaminated groundwater south of Hempstead Turnpike could be the preferred remedy.

In light of this concern, it is strongly recommended that off-site groundwater be designated as Operable Unit 3 and that the upcoming ROD address only on-site soil (OU-1) and on-site groundwater (OU-2). This will allow time to define the extent of contaminated groundwater and the threat to public water supply and, with this information, be in a better position to develop and evaluate remedial alternatives, including management of pumpage and relocation of public water supply wells to mitigate water supply contamination.

2. THE REMEDIAL ACTION TO ADDRESS THREATENED/CONTAMINATED PUBLIC WATER SUPPLY WELLS SHOULD NOT BE LIMITED TO WELL HEAD TREATMENT.

Well head treatment should be the remedial action of last resort. Remediation of the groundwater resource to preclude well head treatment should be the goal. If implementation of groundwater remediation to protect public water supply wells is not possible, other alternatives, including relocation of water supply wells, should be an option of the Water District.

At the present time, the quality of its raw water supply is such that the Massapequa Water District does not need to provide treatment for the removal of V.O.C.'s or heavy metals at any of its facilities. Therefore, the public water supply well head treatment contingency plan as contained in the PRAP is not acceptable to the District. As part of any ROD, it is strongly recommended that the water supply contingency plan include, at the option of the Water District, the relocation of its wells, and that all costs associated with well relocation, including design, land purchase, transmission mains and all required appurtenances, be financed under the State Superfund program.

3. A TECHNICAL ADVISORY COMMITTEE SHOULD BE FORMED TO ASSIST IN THE EVALUATION OF DATA AND SELECTION AND EVALUATION OF ALTERNATIVES REGARDING OFF-SITE GROUNDWATER CONTAMINATION.

It is recommended that a Technical Advisory Committee (TAC) be established to work with NYSDEC, Northrop-Grumman and the Navy in the development of work plans to investigate off-site groundwater contamination and define potential impacts to public water supply wells. This TAC also would assist in the evaluation of data resulting from this investigation, as well as to formulate and evaluate alternatives to remediate groundwater and protect public water supply.

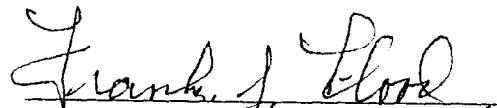
The TAC could include technical representatives of the Bethpage, New York Water Service, South Farmingdale, Massapequa and Town of Hempstead Water Districts. We and the USEPA, through formation of a similar TAC for the Liberty Industrial Finishing Site in


Farmingdale, found this very helpful in defining information needs that would address the water suppliers' concerns and in developing an implementable remedial plan that could be supported by the Districts. The local knowledge of the Districts' consultants can provide valuable input into development of a remedial action that would address the concerns of the impacted community and provide support for the action.

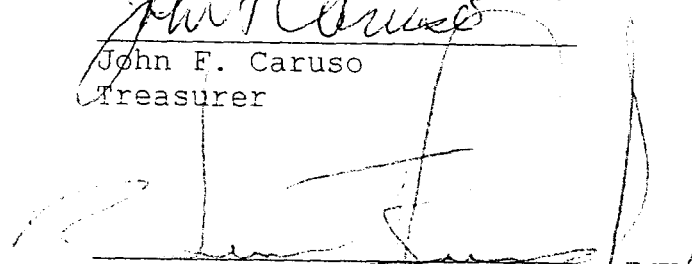
Should the DEC elect not to establish an Operable Unit 3 at this time (as outlined in paragraph 1) than the Massapequa Water District respectfully request a continuance of the January 22, 2001 comment period to be extended sixty additional days for consideration of our position.

Thank you for the opportunity to provide comments regarding this matter of utmost concern to the Massapequa Water District. If you have any questions or require additional information, please do not hesitate to call our Superintendent, Donald F. Farley, P.E. at (516) 798-5266.

Very truly yours,

  
Frank F. Flood  
Chairman

  
John F. Caruso  
Treasurer

  
Vincent Guadagno  
Secretary

cc: Donald F. Farley, P.E. - Massapequa Water District  
Thomas Maher - Dvirka and Bartilucci  
Thomas Donovan - Town of Hempstead Water District  
Matthew Snyder - New York Water Service  
Al Lucci - South Farmingdale Water District